

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

PAPP et al.,)	CASE NO. 1:17cv00800
)	
Plaintiffs,)	JUDGE Polser
)	
v.)	
)	
AS AMERICA, INC.,)	
)	
Defendant.)	

**UNOPPOSED MOTION FOR LEAVE TO MOVE, PLEAD, OR OTHERWISE
RESPOND TO THE COMPLAINT**

Defendant AS America, Inc. (“AS America”) respectfully requests a thirty (30) day extension of time, through and including June 14, 2017, to move, plead, or otherwise respond to Plaintiffs’ Complaint. Counsel for the Plaintiffs has indicated that Plaintiffs have no objection to this motion.

AS America seeks this extension of time not for the purposes of delay, but to allow it sufficient time to investigate the law and facts to prepare its response to the Complaint. No prior extensions have been requested by or granted to AS America.

Based on the foregoing, AS America should be allowed an extension of time through and including June 14, 2017 to move, plead, or otherwise respond to Plaintiffs' Complaint.

Respectfully submitted,

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s/ Natalia Steele

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *Unopposed Motion For Leave To Plead* was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ Natalia Steele
One of the Attorneys for Defendant
AS America, Inc.